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| IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION (Special Ancillary Matters) | : | No. 2:18-md-02323-AB |
| | : | |
| | : | MDL No. 2323 |
| | : | |
| Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i> | : | No. 2:12-md-02323-AB |
| | : | |
| | : | MDL No. 2323 |
| | : | |
| Plaintiffs, | : | Hon. Anita B. Brody |
| | : | |
| v. | : | |
| National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., | : | |
| | : | |
| Defendants. | : | |
| | : | |
| THIS DOCUMENT RELATES TO: | : | |
| ALL ACTIONS | : | |
| | : | |

**MOTION BY CLASS MEMBER ANDREW STEWART TO REQUIRE
CLAIMS ADMINISTRATOR TO PAY REMAINING
AMOUNT OF MONETARY AWARD**

Andrew Stewart, by his undersigned attorneys, hereby moves this Court to enter an Order requiring the Claims Administrator to pay to him the remaining amount of his Monetary Award.

The Claims Administrator made a partial payment of his Monetary Award but has refused to distribute the remainder because RD Legal Funding, LLC ("RD Legal") demands that the funds be distributed to it under the rescission principle described in the Court's Order of December 8, 2017 (ECF No. 9517). As Mr. Stewart has explained to the Claims Administrator, however, RD Legal seeks \$90,000 more

than the principal amount of cash actually received by him. The Claims Administrator's refusal to accept Mr. Stewart's calculation of the rescission amount and distribute the remaining funds due to him operates, impermissibly, as a *de facto* stay of Mr. Stewart's Monetary Award even though the Court of Appeals for the Third Circuit denied RD Legal's Emergency Motion for Stay over two months ago.

The complete basis for this Motion is set forth in the accompanying memorandum of law.

Respectfully submitted,

Dated: June 12, 2018

/s/ Michael H. Rosenthal
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